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EMBRY-RIDDLE
AERONAUTICAL UNIVERSITY

DEPT. OF TRANSPORTATION
DOCKET SECTION

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3200 Willow Creek Road
Prescott, Arizona 86301-3720

August 20, 1999

U.S. Department of Transportation Dockets
Docket No. FAA-1999-6001 -6
400 Seventh Street, SW, Room Plaza 401
Washington DC 20590

Dear Sir:

Regarding the notice of proposed rule making for 14CFR193, I applaud efforts to protect safety improvement data.

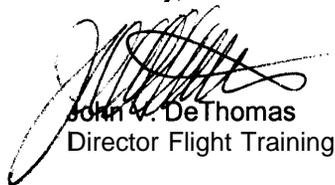
I do view with concern several sections of the proposed Part. Paragraph 193.5 (c), and the discussion in the proposal, would allow the Administrator to conduct investigations based upon data obtained under Part 193 provisions, and then to take enforcement actions on the results of these investigations. Such an open opportunity for enforcement action will chill any voluntary submission of data to the detriment of safety improvement.

Similarly, the provisions of Paragraph 193.7 (a) (3), which allow voluntary information to be used for criminal prosecution, will completely chill any useful submission of data. The extremely wide range of laws which subject individuals to criminal prosecution are so pervasive in our Government that the submission of the most innocuous data would likely subject the submitter to possible criminal investigation.

If we're serious about improving safety in aviation, we must completely protect all voluntarily submitted information from any possible enforcement or prosecution action.

Thank you.

Sincerely,



John W. DeThomas
Director Flight Training

JVD:b